

ECF CASE
JUDGE BUCHWALD

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

J & J SPORTS PRODUCTIONS, INC., as
Broadcast Licensee of the **May 5, 2007**
DeLaHoya/Mayweather Program

Plaintiff,

-against-

MARIA PAULINO, Individually, and d/b/a ANA
COFFEE SHOP a/k/a MARIA PAULINO
RESTAURANT a/k/a ANNA RESTAURANT,

and

ANA COFFEE SHOP a/k/a MARIA PAULINO
RESTAURANT a/k/a ANNA RESTAURANT

Defendants.

**NOTICE OF MOTION FOR
DEFAULT JUDGMENT**
Civil Action No.07-cv-08853
Hon. Naomi Reice Buchwald

PLEASE TAKE NOTICE that upon the affirmation of Julie Cohen Lonstein, sworn to
on the 24th day of January 2008, in support of said application and the exhibits attached
thereto, Plaintiff moves this Court for an order granting the entry of default judgment against the
Defendants jointly and severally as follows:

**Against, MARIA PAULINO, Individually, and d/b/a ANA COFFEE SHOP a/k/a MARIA
PAULINO RESTAURANT a/k/a ANNA RESTAURANT**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)

- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of SIX HUNDRED NINETY DOLLARS AND SIXTY TWO CENTS (\$690.62)

Against, ANA COFFEE SHOP a/k/a MARIA PAULINO RESTAURANT a/k/a ANNA RESTAURANT

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of SIX HUNDRED NINETY DOLLARS AND SIXTY TWO CENTS (\$690.62)

Dated: January 24, 2008
Ellenville, NY 12428

LONSTEIN LAW OFFICE, P.C.

By: /s/ Julie Cohen Lonstein
Julie Cohen Lonstein
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